

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,)	
)	
Plaintiff,)	C. A. No. 05-292 (JJF)
)	
v.)	
)	
TATUNG COMPANY;)	
TATUNG COMPANY OF AMERICA, INC.;)	
CHUNGHWA PICTURE TUBES, LTD.;)	
AND VIEWSONIC CORPORATION,)	
)	
Defendants.		

**DEFENDANTS' TATUNG COMPANY, TATUNG COMPANY
OF AMERICA, INC., CHUNGHWA PICTURE TUBES, LTD.,
and VIEWSONIC CORPORATION FIRST SET OF REQUESTS
FOR ADMISSION TO PLAINTIFF, LG. PHILIPS LCD CO., INC.**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Defendants Tatung Company, Tatung Company of America, Inc., Chunghwa Picture Tubes, Ltd., and ViewSonic Corporation serves upon Plaintiff, LG. Philips LCD Co., Ltd. ("LPL") the following requests for admission.

Unless otherwise expressly stated, the following definitions and instructions are applicable herein.

INSTRUCTIONS

1. Each request for admission should be answered separately, fully, in writing, under oath.
2. If your response to any request is other than an unqualified admission, you shall specifically deny that portion of the matter set forth in the request for admission that you refuse to admit and shall state the reasons for the denial of all or a portion of the request to admit. If

you claim that you cannot specifically admit or deny the matter set forth in the request for admission, you shall set forth in detail the reasons why you cannot truthfully admit or deny the matter set forth in the request for admission. Only if you cannot admit or deny request for admission after conducting a reasonable inquiry of all information known to or reasonably obtainable by you may you claim a lack of information or knowledge as to any matter set forth in a request for admission.

3. If you object to any request, your objection and the basis for the objection shall be stated in writing and with particularity.

4. You shall serve your responses to these requests for admission upon the undersigned attorneys within thirty (30) days of the service of these requests.

5. These requests for admission shall be deemed continuing to the full extent authorized by Federal Rule of Civil Procedure 26(e).

6. Each response to a request should begin on a separate page, with the request repeated, followed by LPL's response.

DEFINITIONS

The following definitions shall apply to the Requests for Admissions that follow:

7. The term "LPL" or "you" or "your" shall mean LG. Philips LCD Co., Ltd.; its parent corporations; subsidiaries; divisions; predecessor companies or proprietorships; any joint venture to which it is a party; and each of its employees, agents, officers, directors, representatives, consultants, accountants, and attorneys, including any person who served in any such capacity at any time.

8. The terms "and" and "or" shall be construed conjunctively or disjunctively as appropriate to make the interrogatories inclusive rather than exclusive.

9. The term “any” or “each” shall be construed to include and encompass “all.”
10. The term “’002 Patent” refers to U.S. Patent No. 5,019,002.
11. The term “Kawamura reference” refers to Japanese Patent Application No. S62-187885 by T. Kawamura et al.
12. The term “Okawa reference” refers to Japanese Patent Application No. S63-106788 by Y. Okawa et al.
13. The term “Oritsuke reference” refers to Japanese Patent Application No. S63-10558 by R. Oritsuke.
14. The term “Yudasaka reference” refers to Japanese Patent Application No. S59-126663 by K. Yudasaka et al.
15. The term “Sakai reference” refers to Japanese Patent Application No. S57-52027 by K. Sakai.
16. The term “Yamada reference” refers to Japanese Patent Application No. S57-52021 by O. Yamada.
17. The term “Kodaira reference” refers to Japanese Patent Application No. S59-126623 by Kodaira.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that LPL does not mark any of its products with the ‘002 patent.

REQUEST FOR ADMISSION NO. 2:

Admit that no LPL Licensee marks any of its products with the ‘002 patent.

REQUEST FOR ADMISSION NO. 3:

Admit that prior to filing this lawsuit, LPL did not notify any Defendant that LPL believed Defendants infringed the '002 patent.

REQUEST FOR ADMISSION NO. 4:

Admit that the February 8, 2002 and February 27, 2002 letters from LPL to CPT (LPL production nos. LPL 00000216 and LPL 00000217) is insufficient notice for damages to commence to accrue pursuant to 35 U.S.C. section 287(a) for any alleged infringement of the '002 patent.

REQUEST FOR ADMISSION NO. 5:

Admit that LPL is not asserting that claims 10, 11, 18-34, and 36 of the '002 patent are infringed by Defendants.

REQUEST FOR ADMISSION NO. 6:

Admit that LPL is not seeking damages for any alleged infringement of the '002 patent by Defendants that took place before May 13, 2005, the filing date of this Complaint.

REQUEST FOR ADMISSION NO. 7:

Admit that LPL is not seeking damages for any alleged infringement of the '002 patent by Defendants under a "lost profits" theory of damages.

REQUEST FOR ADMISSION NO. 8:

Admit that LPL does not know which end products its modules are placed in.

REQUEST FOR ADMISSION NO. 9:

Admit that LPL does not track its product from OEM to systems integrator to branded manufacturer.

REQUEST FOR ADMISSION NO. 10:

Admit that TFT-LCD panels that LPL manufacturers embodies the patented features of the '002 patent.

REQUEST FOR ADMISSION NO. 11:

Admit that there is at least one non-infringing alternative to the '002 patented technology.

REQUEST FOR ADMISSION NO. 12:

Admit that LPL TFT-LCDs use the '002 patented technology.

REQUEST FOR ADMISSION NO. 13:

Admit that at least 50% of the LPL TFT-LCDs use the '002 patented technology.

REQUEST FOR ADMISSION NO. 14:

Admit that LPL is relying upon July 12, 1988, the filing date of the '002 patent, as the date of the conception and reduction to practice of the subject matter claimed in the '002 patent.

REQUEST FOR ADMISSION NO. 15:

Admit that LPL has not produced any documents evidencing a conception or reduction to practice date of the '002 patent before July 12, 1988.

REQUEST FOR ADMISSION NO. 16:

Admit that Scott H. Holmberg has not produced any documents evidencing a conception or reduction to practice date of the '002 patent before July 12, 1988.

REQUEST FOR ADMISSION NO. 17:

Admit that Honeywell, Inc. has not produced any documents evidencing a conception or reduction to practice date of the '002 patent before July 12, 1988.

REQUEST FOR ADMISSION NO. 18:

Admit that on October 23, 1995 Honeywell, Inc. assigned to LG Electronics, all rights to, and 100% interest in the '002 patent, and on September 21, 1999, LG Electronics assigned all rights to LPL.

REQUEST FOR ADMISSION NO. 19:

Admit that the Kawamura reference discloses a method of manufacturing active matrix display backplanes.

REQUEST FOR ADMISSION NO. 20:

Admit that the Kawamura reference discloses a method of manufacturing active matrix displays.

REQUEST FOR ADMISSION NO. 21:

Admit that the Kawamura reference discloses an active matrix array substrate.

REQUEST FOR ADMISSION NO. 22:

Admit that the Kawamura reference discloses forming a pattern of pixels on a substrate.

REQUEST FOR ADMISSION NO. 23:

Admit that the Kawamura reference discloses forming a plurality of row pixel activation lines.

REQUEST FOR ADMISSION NO. 24:

Admit that the Kawamura reference discloses forming a plurality of row pixel activation lines, interconnecting substantially all of said row lines to one another.

REQUEST FOR ADMISSION NO. 25:

Admit that the Kawamura reference discloses forming a plurality of column pixel activation lines.

REQUEST FOR ADMISSION NO. 26:

Admit that the Kawamura reference discloses forming a plurality of column pixel activation lines, interconnecting substantially all of said column lines to one another.

REQUEST FOR ADMISSION NO. 27:

Admit that the Kawamura reference discloses forming a plurality of row and column intersecting pixel activation lines.

REQUEST FOR ADMISSION NO. 28:

Admit that the Kawamura reference discloses forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another.

REQUEST FOR ADMISSION NO. 29:

Admit that the Kawamura reference discloses forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said column lines to one another.

REQUEST FOR ADMISSION NO. 30:

Admit that the Kawamura reference discloses forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another.

REQUEST FOR ADMISSION NO. 31:

Admit that the Kawamura reference discloses forming an outer electrostatic discharge guard ring on said substrate.

REQUEST FOR ADMISSION NO. 32:

Admit that the Kawamura reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines.

REQUEST FOR ADMISSION NO. 33:

Admit that one of ordinary skill in the art relating to the '002 patent would not consider a diode to be a resistance.

REQUEST FOR ADMISSION NO. 34:

Admit that one of ordinary skill in the art relating to the '002 patent would not consider a ring diode to be a resistance.

REQUEST FOR ADMISSION NO. 35:

Admit that one of ordinary skill in the art relating to the '002 patent would consider a diode to be a resistance.

REQUEST FOR ADMISSION NO. 36:

Admit that one of ordinary skill in the art relating to the '002 patent would consider a ring diode to be a resistance.

REQUEST FOR ADMISSION NO. 37:

Admit that the Kawamura reference does not disclose forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via a resistance.

REQUEST FOR ADMISSION NO. 38:

Admit that the Kawamura reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via a ring diode.

REQUEST FOR ADMISSION NO. 39:

Admit that the Kawamura reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via a resistance.

REQUEST FOR ADMISSION NO. 40:

Admit that the Kawamura reference discloses providing protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 41:

Admit that the Kawamura reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel

activation lines via a ring diode to provide protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 42:

Admit that the Kawamura reference does not disclose forming an outer electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via a resistance to provide protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 43:

Admit that the Kawamura reference discloses forming an outer electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via a resistance to provide protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 44:

Admit that the Kawamura reference discloses coupling a plurality of interconnected row and column intersecting pixel activation lines to an outer electrostatic discharge guard ring.

REQUEST FOR ADMISSION NO. 45:

Admit that the Kawamura reference does not disclose coupling a plurality of interconnected row and column intersecting pixel activation lines to an outer electrostatic discharge guard ring via a resistance.

REQUEST FOR ADMISSION NO. 46:

Admit that the Kawamura reference discloses coupling a plurality of interconnected row and column intersecting pixel activation lines to an outer electrostatic discharge guard ring via a ring diode.

REQUEST FOR ADMISSION NO. 47:

Admit that the Kawamura reference discloses coupling a plurality of interconnected row and column intersecting pixel activation lines to an outer electrostatic discharge guard ring via a resistance.

REQUEST FOR ADMISSION NO. 48:

Admit that the Kawamura reference discloses removing an outer electrostatic discharge guard ring prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 49:

Admit that the Kawamura reference discloses removing interconnections between a plurality of column pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 50:

Admit that the Kawamura reference discloses removing interconnections between a plurality of row pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 51:

Admit that the Kawamura reference discloses removing an outer electrostatic discharge guard ring and interconnections between a plurality of column pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 52:

Admit that the Kawamura reference discloses removing an outer electrostatic discharge guard ring and interconnections between a plurality of row pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 53:

Admit that the Kawamura reference discloses removing an outer electrostatic discharge guard ring and interconnections between a plurality of column pixel activation lines and interconnections between a plurality of row pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 54:

Admit that the Kawamura reference discloses every step of the method of claim 1 of the '002 patent.

REQUEST FOR ADMISSION NO. 55:

Admit that the Kawamura reference discloses every step of the method of claim 2 of the '002 patent.

REQUEST FOR ADMISSION NO. 56:

Admit that the Okawa reference discloses a method for the prevention of electrostatic destruction of an active matrix display.

REQUEST FOR ADMISSION NO. 57:

Admit that the Okawa reference discloses a method of manufacturing active matrix displays.

REQUEST FOR ADMISSION NO. 58:

Admit that the Okawa reference discloses an active matrix array substrate.

REQUEST FOR ADMISSION NO. 59:

Admit that the Okawa reference discloses forming a pattern of pixels on a substrate.

REQUEST FOR ADMISSION NO. 60:

Admit that the Okawa reference discloses forming a plurality of row pixel activation lines.

REQUEST FOR ADMISSION NO. 61:

Admit that the Okawa reference discloses forming a plurality of column pixel activation lines.

REQUEST FOR ADMISSION NO. 62:

Admit that the Okawa reference discloses forming a plurality of row and column intersecting pixel activation lines.

REQUEST FOR ADMISSION NO. 63:

Admit that the Okawa reference does not disclose forming a plurality of row pixel activation lines, interconnecting substantially all of said row lines to one another.

REQUEST FOR ADMISSION NO. 64:

Admit that the Okawa reference discloses forming a plurality of row pixel activation lines, interconnecting substantially all of said row lines to an outer electrostatic discharge guard ring.

REQUEST FOR ADMISSION NO. 65:

Admit that the Okawa reference discloses forming a plurality of row pixel activation lines, interconnecting substantially all of said row lines to an outer electrostatic discharge guard ring via diodes.

REQUEST FOR ADMISSION NO. 66:

Admit that the Okawa reference does not disclose forming a plurality of column pixel activation lines, interconnecting substantially all of said column lines to one another.

REQUEST FOR ADMISSION NO. 67:

Admit that the Okawa reference discloses forming a plurality of column pixel activation lines, interconnecting substantially all of said column lines to an outer electrostatic discharge guard ring.

REQUEST FOR ADMISSION NO. 68:

Admit that the Okawa reference discloses forming a plurality of column pixel activation lines, interconnecting substantially all of said column lines to an outer electrostatic discharge guard ring via diodes.

REQUEST FOR ADMISSION NO. 69:

Admit that the Okawa reference discloses forming a plurality of row pixel activation lines, interconnecting substantially all of said row lines to one another.

REQUEST FOR ADMISSION NO. 70:

Admit that the Okawa reference discloses forming a plurality of column pixel activation lines, interconnecting substantially all of said column lines to one another.

REQUEST FOR ADMISSION NO. 71:

Admit that the Okawa reference discloses forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another.

REQUEST FOR ADMISSION NO. 72:

Admit that the Okawa reference discloses forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said column lines to one another.

REQUEST FOR ADMISSION NO. 73:

Admit that the Okawa reference discloses forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another.

REQUEST FOR ADMISSION NO. 74:

Admit that the Okawa reference discloses forming an outer electrostatic discharge guard ring on said substrate.

REQUEST FOR ADMISSION NO. 75:

Admit that the Okawa reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines.

REQUEST FOR ADMISSION NO. 76:

Admit that the Okawa reference does not disclose forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via a resistance.

REQUEST FOR ADMISSION NO. 77:

Admit that the Okawa reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via a ring diode.

REQUEST FOR ADMISSION NO. 78:

Admit that the Okawa reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via a resistance.

REQUEST FOR ADMISSION NO. 79:

Admit that the Okawa reference discloses providing protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 80:

Admit that the Okawa reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via diodes to provide protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 81:

Admit that the Okawa reference does not disclose forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via a resistance to provide protection from electrostatic discharges between a

plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 82:

Admit that the Okawa reference discloses forming an outer electrostatic discharge guard ring on said substrate coupled to a plurality of row and column intersecting pixel activation lines via a resistance to provide protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 83:

Admit that the Okawa reference discloses coupling a plurality of interconnected row and column intersecting pixel activation lines to an outer electrostatic discharge guard ring.

REQUEST FOR ADMISSION NO. 84:

Admit that the Okawa reference does not disclose coupling a plurality of interconnected row and column intersecting pixel activation lines to an outer electrostatic discharge guard ring via a resistance.

REQUEST FOR ADMISSION NO. 85:

Admit that the Okawa reference discloses coupling a plurality of interconnected row and column intersecting pixel activation lines to an outer electrostatic discharge guard ring via diodes.

REQUEST FOR ADMISSION NO. 86:

Admit that the Okawa reference discloses coupling a plurality of interconnected row and column intersecting pixel activation lines to an outer electrostatic discharge guard ring via a resistance.

REQUEST FOR ADMISSION NO. 87:

Admit that the Okawa reference discloses removing an outer electrostatic discharge guard ring prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 88:

Admit that the Okawa reference discloses a removable outer electrostatic discharge guard ring.

REQUEST FOR ADMISSION NO. 89:

Admit that the Okawa reference discloses a removable outer electrostatic discharge guard ring that can be removed prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 90:

Admit that the Okawa reference discloses connections to the outer electrostatic discharge guard ring that are only designed to handle small testing voltages.

REQUEST FOR ADMISSION NO. 91:

Admit that if the outer electrostatic discharge guard ring disclosed in the Okawa reference discloses is not removed prior to completion of the display, the guard ring may limit the larger gate line signals and affect the performance of the active matrix display.

REQUEST FOR ADMISSION NO. 92:

Admit that the Okawa reference discloses removing interconnections between a plurality of column pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 93:

Admit that the Okawa reference discloses removing interconnections between a plurality of row pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 94:

Admit that the Okawa reference discloses removing an outer electrostatic discharge guard ring and interconnections between a plurality of column pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 95:

Admit that the Okawa reference discloses removing an outer electrostatic discharge guard ring and interconnections between a plurality of row pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 96:

Admit that the Okawa reference discloses removing an outer electrostatic discharge guard ring and interconnections between a plurality of column pixel activation lines and interconnections between a plurality of row pixel activation lines prior to completion of the active matrix displays.

REQUEST FOR ADMISSION NO. 97:

Admit that the Okawa reference discloses every step of the method of claim 1 of the '002 patent.

REQUEST FOR ADMISSION NO. 98:

Admit that the Okawa reference discloses every step of the method of claim 2 of the '002 patent.